

November 30, 2009

TO: Larry Stott, Representative
Teamsters Local 117

FROM: Teresa Parsons, SPHR
Director's Review Program Supervisor

SUBJECT: Michael Ferrucci v. Department of Corrections (DOC)
Allocation Review Request ALLO-09-014

On September 29, 2009, I conducted a Director's review telephone conference regarding the allocation of the following Electronics Technician 4 positions located at Monroe Correctional Complex:

Christopher Fadden	Position #BN66
Michael Heue	Position #CR65
Michael Ferrucci	Position #CS34

You and Mr. Ferrucci participated in the Director's review conference. Human Resources Consultants Tina Cooley and Joanne Harmon represented DOC.

Director's Determination

This position review was based on the work performed for the six-month period prior to January 24, 2008, the date Mr. Ferrucci's Position Description Form (PDF) was submitted to the Human Resources (HR) Office. As the Director's designee, I carefully considered all of the documentation in the file, the exhibits presented during the Director's review conference, and the verbal comments provided by both parties. Based on my review and analysis of Mr. Ferrucci's assigned duties and responsibilities, I conclude his position is properly allocated to the Electronics Technician 4 classification.

Background

On January 24, 2008, a PDF was submitted to the HR Office at Monroe Correctional Complex, requesting that Mr. Ferrucci's position be reallocated from an Electronics Technician 4 (ET 4) to the Information Technology Specialist 3 (ITS 3) classification (Exhibit

B-2). On July 2, 2008, Ms. Cooley and Ms. Harmon conducted a desk audit with the employees at Monroe Correctional Complex (Exhibit B-5). On February 12, 2009, Ms. Cooley issued an allocation determination, concluding that the Electronics Technician 4 classification best described the duties and responsibilities assigned to Mr. Ferrucci's position. Specifically, Ms. Cooley determined that although Mr. Ferrucci used information technology tools in the course of his daily work, the majority of work supported the layout, construction, and installation of electronic and safety equipment at the facility.

On March 2, 2009, the Department of Personnel received Mr. Ferrucci's request for a Director's review of DOC's allocation determination.

Summary of Employees' (Fadden, Heue, and Ferrucci) Perspectives

The employees assert they maintain, issue, repair, and replace all radio communication and surveillance systems at Monroe Correctional Complex (MCC). They further assert that they administer the Intuity Audix voice mail system and install all phones and phone lines at the complex. The employees contend their positions perform backup of PBX and voicemail systems to prevent loss of data, and add, delete, and move stations, maintaining complete records to include station information and inside cable assignments. The employees state that they conduct needs assessments, requirements analysis, and that they evaluate products for applications, computing, and/or telecommunication technologies. The employees contend that they perform server and network maintenance for digital video security systems, including network storage, IP cameras, and digital video recorders. The employees indicate they are the only employees certified to install all data and phone lines at the complex. They further state that they maintain door control computers, which includes loading and upgrading software and performing all maintenance on the system. The employees contend that similar positions at other institutions have been allocated to the IT series, and they believe their positions should be reallocated, as well as compensated, to reflect the IT functions they perform.

Summary of DOC's Reasoning

DOC recognizes that technologies change over time but maintains the scope of work assigned to the employees' positions fits within the Electronics Technician class series. DOC contends the employees' positions exist to support safety and security systems at the facility and that they use computer technology as a tool to accomplish their tasks. DOC indicates these systems include security of the perimeter, video surveillance, fire alarms, door and fence controls. As such, DOC asserts the employees use skills to support testing, troubleshooting, installation and layout of equipment used to support safety and communication systems. For example, DOC indicates the employees install, calibrate, and test equipment for video recording systems, electronic lighting control, closed circuit TV, computer touch screens, and electronic fence alarms. DOC indicates they also instruct personnel working with cameras or in control rooms. DOC further indicates the employees customize software, coordinate with vendors, work with schematic drawings, and repair and test the electronic components of the security systems. DOC recognizes the work performed by the employees is exemplary, as well as critical to the institution. However,

DOC believes the Electronics Technician 4 classification is the best fit for the overall duties and responsibilities assigned to the positions.

Rationale for Director's Determination

The purpose of a position review is to determine which classification best describes the overall duties and responsibilities of a position. A position review is neither a measurement of the volume of work performed, nor an evaluation of the expertise with which that work is performed. A position review is a comparison of the duties and responsibilities of a particular position to the available classification specifications. This review results in a determination of the class that best describes the overall duties and responsibilities of the position. Liddle-Stamper v. Washington State University, PAB Case No. 3722-A2 (1994).

The PDF submitted for reallocation describes, in part, the Position Objective for Mr. Ferrucci's position as follows (Exhibit B-2):

. . . this position under the direction of the Plant Manager, plans and executes installation, configuration, maintenance and repair of PLC [Programmable Logic Connectors] control and telecommunication systems to include telephones; two-way radio, close circuit television, cable television, and touch screen control systems. . . .

The above description of work has also been identified as the majority of work assigned to Mr. Ferrucci's position as 60% of his overall work. The PDF also includes the following functions in the section identified as 60%:

- Conducts needs assessment and evaluate new products;
- Translate needs into deliverable solutions;
- Design/redesign systems including system mapping and modeling;
- Install and configure hardware/software and customize off the shelf applications;
- Oversee hardware/software upgrades and cabling projects completed by vendors;
- Serves as system administrator for telecommunication systems;
- Acts as point of contact with Verizon local, long distance, and inmate phone providers.

During the Director's review conference, DOC pointed out that many of the functions bulleted above were directly from the ITS 3 class specification and the list of essential functions on the PDF were verbatim the examples of work listed on the ITS 3 class specification. When considering the duties and responsibilities assigned to the employees' positions, I also reviewed the desk audit notes, which indicate the employees perform tasks such as installing or pulling wires, installing phone jacks, installing and connecting cables, and work on equipment like cameras, intercoms, and alarm systems (Exhibit B-5). Mr. Ferrucci noted that the employees work with fiber optics, not analog networks. Mr. Ferrucci also indicated that the bulk of work has not changed since the previous PDF and that the

request for reallocation was made after learning that similar positions at other DOC institutions had been reallocated to the IT class series.

A summary of the Position Purpose on the December 2006 PDF reads as follows (Exhibit B-4):

. . . under the direction of the Consolidated Plant Manger responsible for design, development, maintenance, repair an installation of electronic systems used in the security and alarm systems within MCC . . .

The majority of work described as 65% includes the position purpose described above as well as testing, servicing, repairing, and installing electronic locking devices, communication systems, and camera systems. The key work activities identified in this section also describe running wire and conduit relating to these systems, supervising an inmate crew as needed, and serving as point of contact for all communication infrastructure questions and concerns. This section also notes the employees are certified to engineer, design, and install communication drops.

When comparing the assignment of work and level of responsibility to the available class specifications, the class series concept (if one exists) followed by definition and distinguishing characteristics are primary considerations.

The class series concept for the Information Technology series reads as follows:

Positions in this category perform professional information technology systems and/or applications support for client applications, databases, computer hardware and software products, network infrastructure equipment, or telecommunications software or hardware.

This category broadly describes positions in one or more information technology disciplines such as: Application Development And Maintenance, Application Testing, Capacity Planning, Business Analysis and/or Process Re-Engineering, Data Base Design And Maintenance, Data Communications, Disaster Recovery/Data Security, Distributed Systems/LAN/WAN/PC, Hardware Management And Support, Network Operations, Production Control, Quality Assurance, IT Project Management, Systems Software, Web Development, or Voice Communications.

Positions which perform information technology-related work to accomplish tasks but are non-technical in nature would not be included in this occupational category.

The definition for an **Information Technology Specialist (ITS) 3** indicates the following:

In support of information systems and users in an assigned area of responsibility, independently performs consulting, designing, programming,

installation, maintenance, quality assurance, troubleshooting and/or technical support for applications, hardware and software products, databases, database management systems, support products, network infrastructure equipment, or telecommunications infrastructure, software or hardware.

Uses established work procedures and innovative approaches to complete assignments and coordinate projects such as conducting needs assessments; leading projects; creating installation plans; analyzing and correcting network malfunctions; serving as system administrator; monitoring or enhancing operating environments; or supporting, maintaining and enhancing existing applications.

The majority of assignments and projects are moderate in size and impact an agency division or large workgroup or single business function; or internal or satellite operations, multiple users, or more than one group. Consults with higher-level technical staff to resolve complex problems.

I recognize that some of the work examples given in the ITS 3 class specification may be similar to aspects of the work performed by these employees. For example, the ITS 3 class specification gives an example of conducting a needs assessment. However, work examples do not form the basis for an allocation. Rather, they lend support to the work envisioned within a classification. A position must first fall within the class series concept and definition. Although these positions work with information technology in carrying out the functions assigned to their positions, the work assigned is described by the Electronics Technician classifications. In determining which class series provided the best fit, I also considered the organizational structure in which the employees' positions report to the Plant Manager (Exhibit B-3).

I also reviewed past Board decisions. In a broad context, the services these employees provide may fit into the Information Technology Specialist classes. However, The PRB has previously determined that while one class appeared to cover the scope of a position, there was another classification that not only encompasses the scope of the position, but specifically encompassed the unique functions performed. Alvarez v. Olympic College, PRB No. R-ALLO-08-013 (2008). Further, the Board has consistently held that "[w]hen there is a definition that specifically includes a particular assignment and there is a general classification that has a definition which could also apply to the position, the position will be allocated to the class with the definition that includes the position" Mikitik v Depts. of Wildlife and Personnel, PAB No. A88-021 (1989).

The definition for the **Electronics Technician (ET) 4** states, in relevant part, that positions serve as a lead or senior level technician and perform work in layout, construction and installation of electronic and safety equipment. Troubleshoots, maintains, repairs and tests, analog, and/or digital electronic equipment. Delivers and installs equipment, calibrate test equipment. Assembles scientific instruments or electronic air monitoring systems. Implements and evaluates workflow priorities. Develops and disseminates instructions and information to unit personnel.

To gain a greater understanding of positions allocated to the Electronics Technician classes, I also reviewed lower level ET classifications. The ET 2 is defined, in part, as performing journey-level work in "layout, construction and installation of radio communications, electronic and safety equipment," which includes maintaining digital electronic equipment and delivering, installing, and calibrating test equipment. The ET 3 is defined, in part, as independently performing complex electronics work, such as "constructing computer-interfaced prototypes; designing computer interfaces with existing apparatus; modifying and installing commercially-built electronic and mechanical apparatus." Finally, the Electronics Technician classification has been specifically defined as installing, maintaining, repairing and testing electrical and electronic systems used in security and alarm surveillance and instructing personnel in the proper operation and minor maintenance of this equipment. In addition, I reviewed a previous decision by the Personnel Appeals Board, which supports the distinction of work assigned to these positions. Though the specific facts differ, the PAB decision provided guidance as to the type of work performed by positions allocated to the Electronics Technician by concluding the following:

The specification for the Electronics Technician classification states that incumbents perform skilled journey level work which includes installing, maintaining, repairing and testing electrical and electronic systems used in security and alarm surveillance and instructing personnel in the proper operation and minor maintenance of this equipment. The typical work for this class includes the installation and maintenance of internal security systems, including electronic surveillance systems, and conducting inspections and tests to ensure the security systems are functional. The typical work also includes recommending purchases of security devices, consulting with contractors, and instructing employees in the use and repair of security systems. This class specifically addresses the maintenance and repair of electrical and electronic systems used in security and alarm surveillance such as those used at Fircrest School. Hafzalla v. Dep't. of Social and Health Services, PAB No. ALLO-00-0025 (2001).

The employees install, configure, maintain, and repair systems used for surveillance and security at MCC, as envisioned by the Electronics Technician classes. The level of responsibilities assigned to these positions fits the highest level of the series as an ET 4.

Part of the employees' argument has been the allocation of similar positions at other institutions. However, the PRB, has previously determined that although a comparison of one position to another similar position may be useful in gaining a better understanding of the duties performed by and the level of responsibility assigned to an incumbent, allocation of a position must be based on the overall duties and responsibilities assigned to an individual position compared to the existing classifications. The allocation or misallocation of a similar position is not a determining factor in the appropriate allocation of a position. Byrnes v. Dept's of Personnel and Corrections, PRB No. R-ALLO-06-005 (2006) citing Flahaut v. Dept's of Personnel and Labor and Industries, PAB No. ALLO 96-0009 (1996).

It is clear the work performed by these employees is highly valued. A position's allocation does not diminish the quality of work performed and is not a reflection of performance. Rather, an allocation is based on the majority of work assigned to a position. Based on the level, scope and diversity of the overall duties and responsibilities assigned to Mr. Ferrucci's position, the Electronics Technician 4 classification is the best fit.

Appeal Rights

RCW 41.06.170 governs the right to appeal. RCW 41.06.170(4) provides, in relevant part, the following:

An employee incumbent in a position at the time of its allocation or reallocation, or the agency utilizing the position, may appeal the allocation or reallocation to . . . the Washington personnel resources board Notice of such appeal must be filed in writing within thirty days of the action from which appeal is taken.

The mailing address for the Personnel Resources Board (PRB) is P.O. Box 40911, Olympia, Washington, 98504-0911. The PRB Office is located at 600 South Franklin, Olympia, Washington. The main telephone number is (360) 664-0388, and the fax number is (360) 753-0139.

If no further action is taken, the Director's determination becomes final.

c: Michael Ferrucci
Tina Cooley, DOC
Joanne Harmon, DOC
Lisa Skriletz, DOP

Enclosure: List of Exhibits

Michael Ferrucci v. Dept. of Corrections

ALLO-09-014

List of Exhibits

A. Michael Ferrucci Exhibits

1. Request for Director's Review March 2, 2009
2. Agency Allocation determination letter dated February 12, 2009

B. DOC Exhibits

1. Agency Allocation determination letter dated February 12, 2009
2. Position Description, signed by the incumbent January 24, 2008, requesting reallocation;
3. Organizational Chart
4. The previous Position Description form for this position signed by the incumbent on December 12, 2006;
5. The results of the desk audit performed on July 2, 2008;
6. Samples of work orders submitted;
7. The Department of Personnel (DOP) Class Specification for the Electronics Technician 4 job classification;
8. The Department of Personnel (DOP) Class Specification for the Information Technology Specialist 3 job classification;
9. The Request for Director's Review filed by Mr. Ferrucci and received by Department of Personnel on March 2, 2009.

C. Other Classifications

1. Electronics Technician
2. Electronics Technician 2
3. Electronics Technician 3